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*Attorneys for Defendant
Everest National Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JUDSON MAC DUFF,

Plaintiff,

vs.

EVEREST NATIONAL INSURANCE d/b/a
EVEREST INSURANCE COMPANY, a foreign
corporation; DOE EVEREST NATIONAL
INSURANCE d/b/a EVEREST INSURANCE
COMPANY EMPLOYEE, an individual; DO
INDIVIDUALS I-X, inclusive; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:23-cv-00174-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR ANSWER TO
COMPLAINT

(SECOND REQUEST)**

Plaintiff Judson MacDuff (“Plaintiff”) and Defendant Everest National Insurance Company (“Everest”) jointly stipulate that Everest’s time to answer Plaintiff’s Complaint is extended twenty-one (21) days from the current date of March 10, 2023, until **March 31, 2023**. The brief requested extension is to allow the parties an opportunity to explore if resolution is possible prior to further proceedings. This request is not for the purposes of delay, and the parties have already conducted a FRCP 26(f) Conference and discussed discovery planning in the event the case proceeds. This is the second extension of time of Everest’s deadline to respond to the Complaint.



1 The parties hereto preserve and do not waive any objections or defenses by this Stipulation.

2 **IT IS SO STIPULATED, this 10th day of March, 2023.**

3 /s/ Howard J. Russell

4 Howard J. Russell, Esq.

5 Sebastian Cribari, Esq.

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8 *Attorneys for Defendant*

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9
10 /s/ Jessica M. Munoz

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13 *Attorneys for Plaintiff Judson Mac Duff*

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17 Dated: March 13, 2023

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: